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July 22, 2019

BY ECF

The Hon. Ramon E. Reyes
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Mustafa Goklu*, No. 19 Cr. 419

Your Honor:

This office represents Mustafa Goklu in this money laundering prosecution. Mr. Goklu is released on bond. As relevant here, Mr. Goklu's release conditions restrict him to the Eastern District of New York.

I write with the consent of Pretrial Services and the government to respectfully request that Mr. Goklu's bond be modified to permit him to travel to the Southern District of New York, with a special condition that he not be permitted to drive a vehicle himself in the SDNY. The reason for this request is that Mr. Goklu and his wife are expecting, and they need to travel to Manhattan for doctor's visits.

Respectfully submitted,

/s James Darrow

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Attorneys for Mustafa Goklu

cc: Counsel of record (by ECF)
U.S. Pretrial Services Officer Bianca Carter (by email)